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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR MOTION IN
LIMINE NO. 27 TO EXCLUDE DR.
HESSELINK'S SAVED DEVELOPMENT
TIME OPINIONS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto LLC's Administrative Motion to File Under Seal Their Motion in Limine No. 27 to
8 Exclude Dr. Hesselink's Saved Development Time Opinions (the "Administrative Motion"). The
9 Administrative Motion seeks an order sealing highlighted portions of Uber's Motion in Limine No. 27
10 ("Uber's Motion") and Exhibits 1-2 thereto, as well as the entirety of Exhibits 3-5 thereto.

11 3. The portions of Uber's Motion and Exhibits 2-5 identified below contain or refer to
12 trade secret information, which Waymo seeks to seal.

13 4. Uber's Motion (portions marked in red boxes in version filed herewith), Exhibit 2
14 (portions highlighted in red), and Exhibits 3-5 (entire documents) contain, reference, and/or describe
15 Waymo's asserted trade secrets, including as misappropriated by Defendants, or information that,
16 form context, tends to disclose Waymo's asserted trade secrets. The information Waymo seeks to seal
17 includes the confidential design and functionality of Waymo's proprietary autonomous vehicle
18 system, including its source code and LiDAR designs, which Waymo maintains as secret. I
19 understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade
20 secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information
21 would give Waymo's competitors access to descriptions of the functionality or features of Waymo's
22 autonomous vehicle system. If such information were made public, I understand that Waymo's
23 competitive standing would be significantly harmed.

24 5. Waymo's request to seal is narrowly tailored to those portions of Uber's Motion and
25 Exhibits 2-5 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on November 17, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.
11

12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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